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Attorneys for Plaintiff, the Collective, and  
putative Class, and Aggrieved Employees  
on behalf of the State of California

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

PAUL MONPLAISIR, on behalf of himself and  
all others similarly situated,

Plaintiffs,

vs.

INTEGRATED TECH GROUP, LLC and  
ITG COMMUNICATIONS LLC,

Defendants.

Case No.: 3:19-cv-01484-WHA

**PLAINTIFF'S NOTICE OF MOTION AND  
MOTION FOR CLASS CERTIFICATION**

Date: February 6, 2020  
Time: 8:00 a.m.  
Ctrm.: 12, 19th Floor

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019  
Trial Date: October 19, 2020

**TO ALL PARTIES AND ATTORNEYS OF RECORD:**

**NOTICE IS HEREBY GIVEN** that at 8:00 a.m. on February 6, 2020 Plaintiff Paul Monplaisir (“Plaintiff”) moves this Court for an order:

(1) Certifying the following class under Fed. R. Civ. P. 23(a), 23(b)(3) for claims of: (i) failing to pay proper minimum wage, overtime wages, and completed piece rates; (ii) failing to provide a reasonable opportunity to take meal and rest periods, and failing to properly compensate Class members when such meal and rest periods were not taken; (iii) failing to reimburse necessarily-incurred business expenses; and (iv) failing to issue accurate, itemized wage statements in violation of the California Labor Code:

All current and former non-exempt hourly employees of ITG working as Technicians throughout the State of California from March 21, 2015 until the resolution of this action (the “Class”).

(2) Appointing Paul Monplaisir as representatives of the Class;

(3) Appointing the law firms of Schneider Wallace Cottrell Konecky Wotkins LLP and Berger & Montague, P.C. as Class Counsel, pursuant to Fed. R. Civ. P. Rule 23(g); and

(4) Pursuant to Fed. R. Civ. P. 23(c)(2)(B), ordering that the class be given best practical notice under the circumstances.

Plaintiffs’ motion is based upon (a) this Notice of Motion and Motion; (b) the Memorandum of Points and Authorities; (c) the Declaration of Proposed Class Counsel Carolyn H. Cottrell; (d) the Declaration of Proposed Class Counsel Michelle S. Lim; (e) the Declaration of Proposed Class Counsel Sarah R. Schalman-Bergen; (f) the Declarations of ten Proposed Class Members; (g) any argument of counsel as may be presented at the class certification hearing; and (h) the pleadings and files in this action.

Dated: December 19, 2019

Respectfully Submitted,

/s/ Ori Edelstein

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